

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In Re:

Bankruptcy No. 25-10046-djb

ROBIN DEBORAH NOVAK

Debtor

Chapter 13

PIER 3 CONDOMINIUM ASSOCIATION

Movant

vs.

ROBIN DEBORAH NOVAK,

Debtor/Respondent

OBJECTION TO CONFIRMATION OF THE CHAPTER 13 PLAN

Pier 3 Condominium Association (“Movant”), through its attorneys, Hladik, Onorato & Federman, LLP, objects to the confirmation of the Chapter 13 Plan (the “Plan”) filed by Robin Deborah Novak (“Debtor”), as follows:

1. As of the bankruptcy filing date of January 6, 2025, Movant holds a secured claim against the Debtor’s property located at 3 North Columbus Blvd, Unit 263, Philadelphia, PA 19106 (the “Property”).
2. Movant has filed its Proof of Claim on March 17, 2025, in the secured total amount of \$72,095.27. *See Proof of Claim# 9 filed on the Claims Register.*
3. The Plan does not provide for the full repayment of Movant’s full claim.
4. The Plan fails to cure the delinquency pursuant to 11 U.S.C. § 1322(b)(5).
5. The Plan violates 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.
6. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtor is not feasible. Movant requests that an Amended Chapter 13 Plan be filed, the bankruptcy case either be converted to a Chapter 7, or be dismissed pursuant to 11 U.S.C. § 1307.

WHEREFORE, Movant respectfully requests that the Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Date: 5/9/2025

HLADIK, ONORATO & FEDERMAN, LLP

BY: /s/ Danielle Boyle-Ebersole

Danielle Boyle-Ebersole, Esquire

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CERTIFICATE OF SERVICE OF OBJECTION TO CHAPTER 13 PLAN

I, the undersigned attorney, attorney for Pier 3 Condominium Association, certify that a copy of the attached Objection to Chapter 13 Plan has been served upon the parties below, on the date set forth below:

Robin Deborah Novak
3 North Columbus Blvd Unit 263
Philadelphia, PA 19106
VIA REGULAR CLASS MAIL
Debtor

Michael A. Cibik, Esquire
VIA CM/ECF Notification
Attorney for Debtor

Kenneth E. West, Esquire
VIA CM/ECF Notification
Chapter 13 Trustee

Date: 5/9/2025

HLADIK, ONORATO & FEDERMAN, LLP

BY: /s/ Danielle Boyle-Ebersole
Danielle Boyle-Ebersole, Esquire
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